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Docket Management Facility
U.S. Department of Transportation
400 Seventh Street, SW
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Washington, DC 20590-001

Reference: Docket Number FAA 2004-19473 -6
Directorate Identifier 2004-CE-35-AD

To whom it may concern:

This operator has delayed the installation of the new up-lock assemblies in accordance with Grob MSB 1121-052/2 until this date. The delay was due to the fact that before MSB 1121-052/2 could be accomplished, this operator was informed, by Grob-Werke, that the new up-locks were experiencing difficulties in the fleet of G120AI aircraft operated outside of the U.S. These difficulties resulted in the issuance of Grob MSB 1121-059, dated 23 FEB 05 and subsequently Grob MSB 1121-060, dated 07 MAR 05.


MSB 1121-059 required a daily inspection of the up-locks, if the new up-locks had been installed, to look for broken or missing snap rings. The failure of these snap rings could result in the failure of the up-lock.

MSB 1121-060 allowed for the "modification" of the up-locks either after installation or prior to installation and it terminated the daily inspections required by MSB 1121-059.

As of this date, this operator has "modified" all new up-locks in accordance with MSB 1121-060 and one set of these up-locks has been installed.

It is the opinion of this operator that the actions required by MSB 1121-060 should be incorporated into this proposed AD for it would eliminate other operators complying with the AD by installing up-locks that then require daily inspections until further actions are taken.

Respectfully,



Tom Vernon, Jr.
Director of Aircraft Maintenance
ATCA

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